

**KML LAW GROUP, P.C.**  
**A PROFESSIONAL CORPORATION INCORPORATED IN PENNSYLVANIA**  
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June 10, 2024

The Honorable Christine M. Gravelle, U.S.B.J.  
Courtroom # 3  
402 East State Street  
Trenton, NJ 08608

RE: David A. Tozzolino and Patricia M. Tozzolino  
Case No. 22-18215-CMG  
Premises: 631 Park Avenue, Union Beach, NJ 07735  
Secured Creditor: M & T Bank

Dear Judge Gravelle,

This office represents M & T Bank ("Secured Creditor"), holder of a mortgage on real property located at 631 Park Avenue, Union Beach, NJ 07735. Please accept this letter in response to Debtor's motion to sell the subject property.

Secured Creditor has reviewed the current motion to sell and the proposed form of order filed with the Court. Secured Creditor does not object to the motion or the proposed order in its current form. Secured Creditor reserves its right to object to the motion.

Secured Creditor's response, in its present form, is not an objection to the current motion to sell the subject property. The undersigned does not intend to appear to prosecute an objection at this time unless the proposed order is amended to a form deemed objectionable.

Respectfully,  
KML LAW GROUP, P.C.

/s/ Denise Carlon, Esq.  
Denise Carlon, Esquire  
dcarlon@kmllawgroup.com  
Attorney for Secured Creditor

**Caption in Compliance with D.N.J. LBR-9004-1**

KML Law Group, P.C.  
By: Denise Carlon Esquire  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
201-549-2363  
Attorneys for Secured Creditor: M&T Bank

In Re:  
David A. Tozzolino  
Patricia M. Tozzolino  
Debtors

Case No: 22-18215 CMG

Chapter: 13

Judge: Christine M. Gravelle

**CERTIFICATION OF SERVICE**

1. I, Patricia Rychards:

☐ Represent the \_\_\_\_\_ in the above-captioned matter.

☒ am the secretary/paralegal for Denise Carlon, who represents the Secured Creditor in the above captioned matter.

☐ am the \_\_\_\_\_ in the above case and am representing myself.

2. On 06/17/2024, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Response to Debtors' Motion for Authorization to Sell Real Property
- Certification of Service

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 06/17/2024

/s/ Patricia Rychards

Name and Address of Party Served	Relation of Party to the Case	Mode of Service
<p>David A. Tozzolino 631 Park Avenue Union Beach, NJ 07735</p> <p>Patricia M. Tozzolino 631 Park Avenue Union Beach, NJ 07735</p>	Debtors	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> Regular mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other</p> <p>_____ (as authorized by the court *)</p>
<p>Warren Brumel Law Office of Warren Brumel 65 Main Street, PO Box 181 Keyport, NJ 07735</p>	Attorney for Debtors	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> Regular mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other</p> <p>_____ (as authorized by the court *)</p>
<p>Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853</p>	Chapter 13 Trustee	<p><input type="checkbox"/> Hand-delivered</p> <p><input type="checkbox"/> Regular mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other</p> <p>_____ (as authorized by the court *)</p>